

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VMWARE LLC,)
)
)
Plaintiff,)
)
v.) C.A. No. 25-353 (RGA)
)
SIEMENS AG, SIEMENS CORPORATION,)
SIEMENS INDUSTRY SOFTWARE, INC.,)
SIEMENS MEDICAL SOLUTIONS USA,)
INC., SIEMENS HEALTHCARE)
DIAGNOSTICS, INC., SIEMENS)
MOBILITY, INC., and PETNET)
SOLUTIONS, INC.,)
)
Defendants.)

DEFENDANTS' CORPORATE DISCLOSURE STATEMENT

Defendants Siemens AG, Siemens Corporation, Siemens Industry Software Inc., Siemens Medical Solutions USA, Inc., Siemens Healthcare Diagnostics Inc., Siemens Mobility, Inc., and PETNET Solutions, Inc. (collectively, "Defendants"), through their attorneys, hereby state as follows pursuant to Federal Rule of Civil Procedure 7.1:

1. Siemens AG is publicly traded on the Frankfurt Stock Exchange. No publicly held corporation owns 10% or more of the stock of Siemens AG.
2. Siemens Corporation is a wholly owned subsidiary of Siemens USA Holdings, Inc., which is a wholly owned indirect subsidiary of Siemens AG. No publicly held corporation owns 10% or more of the stock of Siemens AG.
3. Siemens Industry Software Inc. is a wholly owned subsidiary of Siemens Industry, Inc., which is a wholly owned subsidiary of Siemens Corporation, which is a wholly owned subsidiary of Siemens USA Holdings, Inc., which is a wholly owned indirect subsidiary of Siemens AG. No publicly held corporation owns 10% or more of the stock of Siemens AG.

4. Siemens Medical Solutions USA, Inc. is a wholly owned indirect subsidiary of Siemens Healthineers AG. Siemens Healthineers AG is publicly traded on the Frankfurt Stock Exchange. Siemens AG owns more than 10% of the stock of Siemens Healthineers AG. No publicly held corporation owns 10% or more of the stock of Siemens AG.

5. Siemens Healthcare Diagnostics Inc. is a wholly owned indirect subsidiary of Siemens Healthineers AG. Siemens AG owns more than 10% of the stock of Siemens Healthineers AG. No publicly held corporation owns 10% or more of the stock of Siemens AG.

6. Siemens Mobility, Inc. is a wholly owned subsidiary of Siemens Mobility GmbH, which is a wholly owned subsidiary of Siemens AG. No publicly held corporation owns 10% or more of the stock of Siemens AG.

7. PETNET Solutions, Inc. is a wholly owned indirect subsidiary of Siemens Healthineers AG. Siemens AG owns more than 10% of the stock of Siemens Healthineers AG. No publicly held corporation owns 10% or more of the stock of Siemens AG.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Karen Jacobs

OF COUNSEL:

Gregg F. LoCascio, P.C.
Michael A. Pearson, Jr.
KIRKLAND & ELLIS LLP
1301 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 389-5000

James John Lomeo
KIRKLAND & ELLIS LLP
401 Congress Avenue
Suite 2500
Austin, TX 78701
(512) 678-9050

Karen Jacobs (#2881)
Cameron P. Clark (#6647)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
kjacobs@morrisnichols.com
cclark@morrisnichols.com

Attorneys for Defendants Siemens AG, Siemens Corporation, Siemens Industry Software Inc., Siemens Medical Solutions USA, Inc., Siemens Healthcare Diagnostics Inc., Siemens Mobility, Inc., and PETNET Solutions, Inc.

June 10, 2025

CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on June 10, 2025, upon the following in the manner indicated:

Paul J. Loughman, Esquire *VIA ELECTRONIC MAIL*
Robert M. Vrana, Esquire
Colin A. Keith, Esquire
YOUNG CONAWAY STARGATT & TAYLOR, LLP
Rodney Square
1000 North King Street
Wilmington, DE 19801
(302) 571-6600
Attorneys for Plaintiff

David H. Herrington, Esquire *VIA ELECTRONIC MAIL*
CLEARY GOTTLIEB STEEN & HAMILTON LLP
One Liberty Plaza
New York, NY 10006
(212) 225-2000
Attorneys for Plaintiff

Angela L. Dunning, Esquire *VIA ELECTRONIC MAIL*
Ye Eun Charlotte Chun, Esquire
CLEARY GOTTLIEB STEEN & HAMILTON LLP
1841 Page Mill Road, Suite 250
Palo Alto, California 94304
(650) 815-4100
Attorneys for Plaintiff

/s/ *Karen Jacobs*

Karen Jacobs (#2881)